UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS PENSION FUND, NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS WELFARE FUND, NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS VACATION FUND, NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS ANNUITY FUND, NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS APPRENTICESHIP, JOURNEYMAN RETRAINING, EDUCATIONAL AND INDUSTRY FUND, NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS CHARITY FUND, and THE NEW YORK CITY AND VICINITY CARPENTERS LABORMANAGEMENT COOPERATION FUND, by MICHAEL J. FORDE and PAUL O'BRIEN, as TRUSTEES,

07 CV 6781 (LAK) ECF CASE

NOTICE OF MOTION

Plaintiffs,

-against-

ACE DRYWALL AND DRAPERIES, INC.,

Defendant.
 X

COUNSEL:

PLEASE TAKE NOTICE, that upon the annexed affidavit of Andrew Grabois, Esq. sworn to on September 18, 2007, the stipulated facts and exhibits annexed thereto, and upon all pleadings and proceedings heretofore and herein, the undersigned, on behalf of the plaintiffs, will move this Court before the Honorable Lewis A. Kaplan, United States District Court Judge at the United States Courthouse, Southern District of New York, located at 500 Pearl Street, Courtroom 12-D, New York, New York 10007, at a date and time to be set by the Court, for an Order granting plaintiffs' motion for default judgment, and for such other and further relief as the Court deems proper and just.

Dated: New York, New York September 18, 2007

O'DWYER & BERNSTIEN, LLP

By:

ANDREW GRABOIS, ESQ. Autorney for Plaintiffs 52 Duane Street, 5th Floor New York, New York 10007

(212) 571-7100

Yours.

TO: Ace Drywall and Draperies, Inc. 138 Bathgate Street
Staten Island, NY 10312